

Management Control Procedure

Administrative Requirements/Process for Material Transfers



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Materials and Fuels Complex	Management Control Procedure	USE TYPE 3	eCR Number: 615463
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Manual: MFC RSWF Operating Instructions (OI)

REVISION LOG

Rev.	Date	Affected Pages	Revision Description
0	10/21/02	All	New Issue.
0a	12/18/02	1 through 5	Change. Includes periodic review.
0b	06/30/05	1, 2, 4, and 5	Change.
1	12/01/06	3-5, 7, and 8	See DAR 506804.
2	08/30/07	3 and 5-7	See eCR 551558. Revision.
3	12/13/07	3-5, 7, and 8	See eCRs 554082 and 556412. Permanent field change.
4	06/11/09	All	See eCR 569435. Revision.
5	08/23/12	All	See eCR 605947. SAR-407 implementation and periodic review.
6	04/09/13	5 and 8	See eCR 607403. PFC.
7	12/23/14	All	See eCR 615463. Periodic review.

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1. PURPOSE/SCOPE

This procedure describes the overall administrative requirements/process used by RSWF Management for approving material-transfer activities at the Radioactive Scrap and Waste Facility (RSWF) to ensure that proposed transfers are covered by safety documentation and receive the appropriate level of approval. “Transfer activities” or “transfer,” as used in this procedure, is inclusive of the necessary storage and retrieval operations for the activity performed.

Operations in RSWF are limited to the transfer of materials into a liner for storage, the retrieval of material from a liner for transfer to another facility, or the transfer of materials from one liner to another. Transfers are limited to the movement of the contents of a single liner at one time (one container). No direct handling, repackaging, or processing is conducted.

TSR-407, AC 5.407.1

Container HANDLING is limited to a single container at any one time.

2. BACKGROUND

RSWF is located a half mile north of the MFC site. It is a Resource-Conservation-and-Recovery-Act (RCRA) permitted facility that is used to store remote-handled (RH) radioactive materials, which includes mixed waste (containing sodium), radioactive waste, and other radioactive material (spent nuclear material, accountable material). RSWF is a Hazard Category-2 nonreactor, nuclear facility. As such, facility operations must be conducted in accordance with SAR-407, “Safety Analysis Report for the Radioactive Scrap and Waste Facility (MFC-771)” and TSR-407, “Technical Safety Requirements for the Radioactive Scrap and Waste Facility (MFC-771).”

3. ADMINISTRATIVE REQUIREMENTS**TSR-413 AC 5.413.1**

- 3.1 All material transfers into or out of RSWF involving payloads that exceed the Hazard Category-3 radionuclide thresholds must be performed in accordance with the shipping requirements of TSM-OI-003, “Transfer of Hazardous Material in Non-DOT-Certified Packaging Between MFC Nuclear Facilities,” and identified in LST-337, “Approved Container/Payload List for Inter-Facility Transfer Operations at MFC.”
- 3.2 All material transfers into, out of, or between areas at RSWF must be approved by the TSD Facilities Manager and coordinated with the TSD Facilities Area Shift Supervisor (SS).

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- 3.3 Information regarding material proposed for transfer to RSWF for storage must be submitted to the SS by the Generator/Requestor via an RSWF Material Waste Acceptance Checksheet (reference RSWF-OI-003, Appendix A) and necessary supporting documentation.
- 3.4 The SS serves as the point of contact for all RSWF transfers and works in concert with waste generators to assemble the required transfer documentation package, which consists of:
- An RSWF Waste Acceptance Checksheet and supporting documentation (for storage operations)
 - Transfer of HC-3 or Greater Quantity of Hazardous Material in Non-DOT Certified Packaging Checksheet (reference FRM-790, "Transfer of HC-3 or Greater Quantity of Hazardous Material in Non-DOT-Certified Packaging")
 - Safeguards transfer documents (where applicable).
- 3.5 All RSWF transfer activity procedures must be approved by the TSD Facilities Manager.
- 3.6 If chemicals (e.g., solvent, cleaning agent) are required for the performance of an activity, the chemicals must be removed from the facility upon completion of the activity.
- 3.7 The following TSR-407 Administrative Controls (ACs) are applicable to work performed at the RSWF.
- LCO/SAC 3.407.1 Container Position
 - LCO/SAC 3.407.2 Supplemental Radiological Control
 - AC 5.407.1 Container Handling Limit
 - AC 5.407.2 RSWF In-facility Movements
 - AC 5.407.3 Cask Seating Requirement
 - AC 5.407.4 Staffing Requirement
 - AC 5.407.5 Soil Excavation Control
 - AC 5.407.6 Criticality Safety Controls.

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4. MATERIAL-TRANSFER APPROVAL PROCESS

4.1 General

Before material can be stored at or retrieved from RSWF, the proposed transfer is evaluated for compliance with all applicable regulations that govern protection of personnel and the environment and nuclear safety. Personnel and environmental protection is assured through the use of LWP-21220, 'Work Management,' and compliance with the RSWF material acceptance criteria. Nuclear safety is assured by applying a systematic evaluation process, as outlined in this procedure.

4.2 Process Description

4.2.1 The **Waste Generator/Requestor** will perform the following:

- 4.2.1.1 Contact the SS and reach an agreement on the proposed transfer and desired transfer date.
- 4.2.1.2 For storage operations only, complete the generator portion of an RSWF Material Acceptance Checksheet (reference RSWF-OI-003) and supply the necessary supporting documentation to the SS.

NOTE *The SS is the point of contact for all transfers into or out of RSWF.*

4.2.2 The **SS** will perform the following:

- 4.2.2.1 Work with the waste generator to assemble the required documentation for the transfer (reference Requirement 3.4).
- 4.2.2.2 Forward the transfer documentation package to the TSD Facilities Manager for review and approval.
- 4.2.2.3 After receiving the approved transfer documentation package, finalize the transfer schedule and file the related documentation.

4.2.3 The **TSD Facilities Manager** will evaluate and document (reference Appendix A, RSWF-Transfer Evaluation Checksheet) the proposed transfer as follows:

- 4.2.3.1 For storage operations only, verify material meets the material acceptance criteria contained in RSWF-OI-003.
- 4.2.3.2 Review all proposed transfers for compliance with any special or unique requirements, such as additional security.

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4.2.3.3 Verify procedures are adequate for proposed transfer activity.

4.2.3.4 Verify RSWF personnel training is adequate for the proposed transfer activity.

TSR-413 AC 5.413.1

4.2.3.5 Verify that the proposed transfer into or out of RSWF is in compliance with the requirements specified in LST-337.

4.2.3.6 Verify that approval of the proposed transfer is documented on FRM-790.

4.2.3.7 After approval, return the transfer documentation package to the SS.

5. RECORDS

FRM-790, "Transfer of HC-3 or Greater Quantity of Hazardous Material in Non-DOT-Certified Packaging"

NOTE: *[LWP-1202, "Records Management,"](#) the [INL Records Schedule Matrix](#), and associated [record types list\(s\)](#) provide current information on the retention, quality assurance, and/or destruction moratorium requirements for these records. Contact a [Records Coordinator](#) for assistance if needed.*

6. DEFINITIONS

None.

7. REFERENCES

Code of Federal Regulation, Title 10, "Energy," Part 830.203, "Unreviewed Safety Question Process"

FRM-790, "Transfer of HC-3 or Greater Quantity of Hazardous Material in Non-DOT-Certified Packaging"

LST-337, "Approved Container/Payload List for Inter-Facility Transfer Operations at MFC"

LST-391, "Criticality Safety Controls for RSWF"

LST-1202, "Records Management"

LWP-21220, "Work Management"

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RSWF-OI-003, “Material Acceptance for Storage”

SAR-407, “Safety Analysis Report for the Radioactive Scrap and Waste Facility (MFC-771)”

TSM-OI-003, “Transfer of Hazardous Material in Non-DOT-Certified Packaging Between MFC Nuclear Facilities”

TSR-407, “Technical Safety Requirements for the Radioactive Scrap and Waste Facility (MFC-771)”

8. APPENDIX

Appendix A, RSWF-Transfer Evaluation Checksheet

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Appendix A**RSWF-Transfer Evaluation Checksheet**

Transfer item:			
Type of transfer (check one):	<input type="checkbox"/> Retrieval <input type="checkbox"/> Storage		
Reviews/Evaluations			✓
If the transfer is for storage, the material meets the material acceptance criteria contained in RSWF-OI-003, "Material Acceptance for Storage."			
Any additional requirements (e.g., security) have been addressed			
RSWF procedures have been reviewed and are adequate for the transfer.			
RSWF training has been reviewed and is adequate for the transfer.			
The proposed transfer operation complies with the requirements of SAR/TSR-413.			
Approval of the proposed transfer is documented on FRM-790.			
Conclusions			✓
The transfer is covered by existing evaluations, requirements, procedures, and training.			
The transfer is approved.			
TSD Facilities Manager:		Date:	